

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MOM CA Investco LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10321 (BLS)

(Jointly Administered)

Re: Docket Nos. 611 & 621

**NOTICE OF FILING OF REVISED ORDER PURSUANT
TO SECTION 1112(A) AND (B) OF THE BANKRUPTCY CODE,
(I) CONVERTING THE DEBTORS' CASES TO CASES UNDER
CHAPTER 7; (II) GRANTING THE REAL PROPERTY LENDERS RELIEF
FROM THE AUTOMATIC STAY; AND (III) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on June 27, 2025, Mohammad Honarkar and 4G Wireless, Inc. (collectively, the “Honarkar Parties”) filed the *Emergency Motion of Mohammad Honarkar and 4G Wireless, Inc. for Entry of an Order Dismissing or Converting the Chapter 11 Case Pursuant to 11 U.S.C. § 1112(b)* [Docket No. 611] (the “Motion”).

PLEASE TAKE FURTHER NOTICE that, in response to the Motion, on June 30, 2025, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Debtors’ Statement Regarding Conversion* [Docket No. 621] (the “Statement”).² Attached to the

¹ The Debtors in these chapter 11 proceedings, together with the last four digits of each Debtor’s federal tax identification number, are: MOM CA Investco LLC [6263], MOM AS Investco LLC [6049], MOM BS Investco LLC [6180], Retreat at Laguna Villas, LLC [2046], Sunset Cove Villas, LLC [9178], Duplex at Sleepy Hollow, LLC [9237], Cliff Drive Properties DE, LLC [0893], 694 NCH Apartments, LLC [0318], Heisler Laguna, LLC [4709], Laguna Festival Center, LLC [4073], 891 Laguna Canyon Road, LLC [0647], 777 AT Laguna, LLC [8715], Laguna Art District Complex, LLC [8316], Tesoro Redlands DE, LLC [2764], Aryabhata Group LLC [7332], Hotel Laguna, LLC [9580], 4110 West 3rd Street DE, LLC [8641], 314 S. Harvard DE, LLC [2057], Laguna HI, LLC [6408], Laguna HW, LLC [9470], The Masters Building, LLC [6134], 837 Park Avenue, LLC [3229], and Terra Laguna Beach, Inc. [2344] (interim). The Debtors’ headquarters are located at 520 Newport Center Drive, Suite 480, Newport Beach, CA 92660.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Statement.

Statement as Exhibit A was a proposed form of order converting the Chapter 11 Cases to cases under chapter 7 (the “Proposed Order”).

PLEASE TAKE FURTHER NOTICE that attached hereto as Exhibit A is a revised proposed form of order (the “Revised Proposed Order”). The Revised Proposed Order has been circulated to the Real Property Lenders and the United States Trustee for the District of Delaware. For the convenience of the Court and all parties in interest, a blackline of the Revised Proposed Order against the Proposed Order is attached hereto as Exhibit B.

PLEASE TAKE FURTHER NOTICE that, the Debtors intend to seek entry of the Revised Proposed Order at the hearing (the “Hearing”) scheduled for July 15, 2025 at 11:00 a.m. (ET). The Debtors reserve all rights to modify the Revised Proposed Order at or prior to the Hearing.

Dated: July 14, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ Katelin A. Morales

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